

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF VIRGINIA
3 (Alexandria Division)

4 - - - - - X
5 DAVID GRAHAM GOODMAN, :
6 Plaintiff, :
7 v. : Case Action No.
8 KENNETH W. STOLLE, et al., : 1:13-cv-540
9 Defendants. :
10 X

11 Remote Deposition
12 Wednesday, September 8, 2021
13 Deposition via Zoom of LINDA RICHIE, a
14 witness herein, called for examination by counsel for
15 Plaintiff in the above entitled matter, pursuant to
16 notice, the witness being duly sworn by Desirae S.
17 Jura, a Notary Public in and for the Commonwealth of
18 Virginia, taken at 10:04 a.m., ET, and the
19 proceedings being taken down by Desirae S. Jura, RPR,
20 and transcribed under her direction.
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1 BY MS. ANDREWS:

2 Q. I have one quick follow-up. Did you
3 receive -- and I only want a yes or no answer to
4 this. Did you receive a litigation hold in
5 connection with this lawsuit filed by Mr. Goodman?

6 MR. ROSEN: You mean -- when? At the
7 time? At what time? You mean when the suit was
8 filed?

9 MS. ANDREWS: I just want to know if she's
10 received a litigation hold at all in connection with
11 this. That's my first question.

12 MR. ROSEN: You mean ever?

13 MS. ANDREWS: Yeah, ever, in connection
14 with Mr. Goodman's lawsuit.

15 MR. ROSEN: Well, I object to the form of
16 the question as to relevance, ever. You can answer
17 that.

18 THE WITNESS: I would have to go back and
19 look. I don't believe prior to being served notice
20 of the suit that I had, but I would have to go back
21 and look.

22 BY MS. ANDREWS:

1 Q. Do you remember if you received a
2 litigation hold at all, whether it was before or
3 after you got notice of the lawsuit?

4 A. I don't believe so. Again, if I did, it
5 would be in the legal paperwork that we submitted to
6 Jeff, but I do not believe we received a lit. hold on
7 this. I just believe I received notification of the
8 lawsuit.

9 MS. ANDREWS: Okay. That's all I have.
10 Thank you for your time.

11 MR. ROSEN: I guess we'll read to ensure
12 it's been transcribed accurately by the court
13 reporter. You know, we'll read it.

14 (Discussion off the record.)

15 MR. ROSEN: Then I'd like an electronic
16 copy, please.

17 (Whereupon, at 11:32 a.m., ET, the instant
18 deposition ceased.)

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